

### REMARKS

This application has been carefully reviewed in light of the Office Action dated July 14, 2005. Claims 1 to 3, 5 to 7, 9 to 15, 17 to 19 and 21 to 26 are in the application, of which Claims 1, 7, 13, 19, 25 and 26 are independent. Reconsideration and further examination are respectfully requested.

Applicant thanks the Examiner for the courtesies and thoughtful treatment afforded to Applicant's representative during the October 27, 2005, telephonic interview with the Examiner. Applicant submits that the forgoing amendments and following remarks accurately reflect the substance of the interview.

On a formal note, during the interview the Examiner agreed to contact Applicant's representative before issuing a next Office Action, in the case that she believes further discussion would likely advance prosecution of the present application.

Turning to the Office Action, Claims 1 to 3, 5 to 7, 9 to 15, 17 to 19 and 21 to 26 were rejected under 35 U.S.C. § 103(a) over U.S. Patent 6,505,205 (Kothuri). Reconsideration and withdrawal of the rejections are respectfully requested.

Independent Claim 1 defines a method of marking an input tree, the input tree describing a document and comprising a plurality of parent nodes and child nodes, wherein each parent node defines operations to be performed on child nodes of that parent node. The method comprises the step of determining which of the plurality of nodes fit into a target area within the document. The determining step comprises the sub-steps of (a1) setting one of the plurality of nodes as a current node for the target area and (a2) comparing the size of the current node with available space in the target area. The determining step also comprises (a3) deciding that the current node fits into the target area, if the size of the current node is not greater than the available space, and (a4) if the size of

the current node is greater than the available space, performing further sub-steps of determining whether the current node is a parent node, setting one of the child nodes as the new current node if the current node is a parent node, and recursively executing steps (a2) to (a4) with respect to the new current node. The method also comprises marking the nodes that fit into the target area with a common mark specific to the target area such that a section of the input tree that fits into the target area is defined while preserving the structure of the input tree.

Independent Claims 13 and 25 relate to an apparatus and computer program product, respectively, that correspond generally to independent Claim 1.

The cited references are not seen to disclose or to suggest the features of independent Claims 1, 13 and 25, and in particular, are not seen to disclose or to suggest at least the feature of marking the nodes that fit into the target area with a common mark specific to the target area such that a section of the input tree that fits into the target area is defined while preserving the structure of the input tree. Accordingly, independent Claims 1, 13 and 25 are believed to be allowable. During the interview, the Examiner tentatively agreed Kothuri does not disclose the features of independent Claims 1, 13 and 25, and suggested filing this written response for her further consideration.

Independent Claim 7 defines a method of forming a tree fragment from an input tree by splitting the input tree. The input tree has nodes marked with a common mark associated with the tree fragment such that a section of the input tree is defined while preserving the structure of the input tree. The input tree describes a document and comprises a plurality of parent nodes and child nodes, wherein each of the parent nodes defines operations to be performed on child nodes of that parent node. The method comprises the steps of identifying the nodes marked with the common mark associated

with a respective tree fragment, and generating the tree fragment creating respective tree fragments from the nodes marked with the common mark.

Independent Claims 19 and 26 relate to an apparatus and computer program product, respectively, that correspond generally to independent Claim 7.

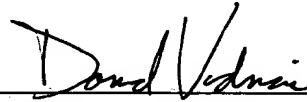
The cited references are not seen to disclose or to suggest the features of Claims 7, 19 and 26, and in particular, are not seen to disclose or to suggest at least the features of splitting an input tree, which has nodes marked with a common mark associated with a tree fragment such that a section of the input tree is defined while preserving the structure of the input tree, by identifying nodes marked with a common mark associated with a respective tree fragment and generating a tree fragment creating respective tree fragments from the nodes marked with the common mark. Accordingly, independent Claims 7, 19 and 26 are believed to be allowable. During the interview, the Examiner tentatively agreed Kothuri does not disclose the features of independent Claims 7, 19 and 26, and suggested filing this written response for her further consideration.

The other claims in the application are each dependent from the independent claims and are believed to be allowable over the applied references for at least the same reasons. Because each dependent claim is deemed to define an additional aspect of the invention, however, the individual consideration of each on its own merits is respectfully requested.

No other matters being raised, it is believed that the entire application is fully in condition for allowance, and such action is courteously solicited.

Applicant's undersigned attorney may be reached in our Costa Mesa,  
California office at (714) 540-8700. All correspondence should continue to be directed to  
our below-listed address.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Damond E. Vadnais", is written over a horizontal line.

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